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May 9, 2025

VIA ECF

Honorable Cheryl L. Pollak, U.S.M.J.
United States District Court
Eastern District of New York
100 Federal Plaza
Central Islip, New York 11722

Re: Nuro Feratovic v. Neptune Maintenance Corp. et al
Case No.: 1:24-cv-04186

Dear Judge Pollak:

This firm represents Defendants, Neptune Maintenance Corp., Albert Doe, and Khalil Doe (collectively “Defendants”) in the above-referenced action.

On April 17, 2025, Plaintiff filed Plaintiff’s First Motion to Amend Complaint. The Court ordered Defendants to file their opposition, if any, by May 2, 2025, and on May 1, 2025, Defendants filed a request for an adjournment until May 9, 2025 to allow for additional time to research the claims alleged, which Plaintiffs consented to. The Court granted this extension.

After reviewing Plaintiff’s Amended Complaint, Defendants do not oppose Plaintiff’s First Motion to Amend Complaint. However, Defendants reserve their right to move to dismiss the Amended Complaint if served.

We thank the Court for its attention to this matter.

Respectfully submitted,

Joseph M Labuda

Joseph M. Labuda Esq.

cc: Counsel of Record